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July 7, 2023

Via ECF

The Honorable Elizabeth A. Pascal
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Lavell v. Camden County College
Civil Action No.: 1:21-cv-06832-KMW-EAP

Dear Judge Pascal:

We represent the Defendant, Camden County College, in the above matter. We write to the Court to respectfully request an extension to serve Defendant's supplemental expert report. Pursuant to Your Honor's June 20, 2023 Order, Defendant's supplemental expert report is currently due on July 21, 2023. Counsel for Plaintiff, Mr. Rieser, is in the process of obtaining the raw data utilized by Dr. Thompson in his rebuttal expert report and expects to provide the data to defense counsel by early next week. Defendant respectfully requests a three (3) week extension for service of Defendant's supplemental report to allow time for Defendant's expert to review the data and author a supplemental expert report. If granted, Defendant's expert report would now be due on August 11, 2023. We have conferred with Plaintiff's Counsel, Mr. Rieser, who consents to this request.

We thank the Court for its consideration of this matter.

Respectfully submitted,
BROWN & CONNERY, LLP

s/ Kathleen E. Dohn
Kathleen E. Dohn

cc: William Rieser, Esquire (*via ECF*)